

**UNITED STATES BANKRUPTCY COURT
FOR THE
DISTRICT OF MASSACHUSETTS**

In re:

Robert A. Najarian,
Debtor.

Case No. 11-14684-JNF
Chapter 7

Motion of Chapter 7 Trustee for Entry of Proposed Order

Warren E. Agin, the chapter 7 trustee (the “Trustee”) for the estate of the above-named debtor (the “Debtor”), hereby submits his Motion for Entry of Proposed Order in relation to the *Motion of Chapter 7 Trustee For Authority To Sell Estate Property, Real Estate Located at 110 Riverview Lane, Centerville, Massachusetts, at Private Sale Pursuant To 11 U.S.C. § 363, and Request for a Hearing on or Before April 1, 2016*, being number 199 on the docket. In support of his motion the Trustee states the following:

1. On March 2, 2016, the Trustee filed the *Motion of Chapter 7 Trustee For Authority To Sell Estate Property, Real Estate Located at 110 Riverview Lane, Centerville, Massachusetts, at Private Sale Pursuant To 11 U.S.C. § 363, and Request for a Hearing on or Before April 1, 2016*, being number 199 on the docket (the “Motion”).
2. On March 31, 2016, the Court held a hearing on the Motion, conducted a sale auction, and authorized the sale of the real estate to Kirill and Irina Jacobson (the “Buyers”). Also on March 31, 2016, the Court issued a short preliminary order, being docket number 203.
3. The Buyers require a separate, more detailed order for recording with the registry of deeds.
4. A proposed order is attached as Exhibit A. The terms of the order correspond

with the relief requested in the Motion, as modified by the results of March 31 sale hearing. Buyers counsel has reviewed and approved the proposed order.

WHEREFORE the Trustee prays for the entry of the proposed Order in the form attached as Exhibit A.

Dated April 6, 2016

Warren E. Agin, as Trustee,
By his Attorney,

/s/ Daniel Kostrzewa
Daniel Kostrzewa (BBO 691691)
Swiggart & Agin, LLC
197 Portland Street
Boston, MA 02114
(617) 742-0110 x 204
dpk@swiggartagin.com

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CERTIFICATE OF SERVICE

I, Daniel Kostrzewa, do hereby certify that:

A. on April 6, 2016, I caused a Notice of Electronic Filing to be electronically transmitted to the following parties with respect to the **Motion of Chapter 7**

Trustee for Entry of Proposed Order (the “Pleading(s)”):

Warren E. Agin

Richard J. Cohen

Richard C. Demerle

Kenneth S. Jannette

Charles Jeanfreau

Martin A. Mooney

Marcuss Pratt

Michael B. Stusse

Jordan Wilcox

Office of US Trustee

B. on April 6, 2016, I served a copy of the Pleadings on the following parties by mailing

a copy of the same by first class mail, postage prepaid, except where the Notice of

Electronic Filing indicated that Notice was electronically mailed to the party: None

Signed under the penalties of perjury April 6, 2016.

/s/ Daniel Kostrzewa

Daniel Kostrzewa (BBO 691691)

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